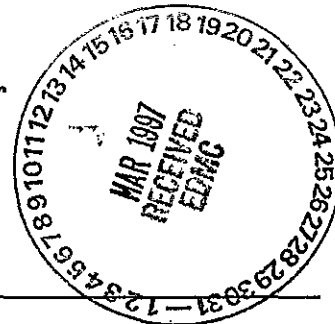


Meeting Minutes  
Interim Status Dangerous Waste Tank Systems  
Hanford Federal Facility Agreement and Consent Order  
Milestone M-32-00

PROJECT MANAGERS MEETING  
November 1, 1996



The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting (PMM).

W. R. Brown, Representative, Fluor Daniel Hanford, Inc.

Date: 2-19-97

D. E. Jackson, Project Manager, Department of Energy, Richland Operations Office

Date: 3-5-97

J. M. Thurman, Representative, Lockheed Martin Hanford Corporation

Date: 2/5/97

R. W. Wilson, Unit Manager, Washington State Department of Ecology

Date: 02/19/97

Purpose: Discuss current Double-Shell Tank Farm, 244-AR Vault and 242-A Evaporator issues related to Milestone M-32-00.

Meeting minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion, Agreements and Actions
- Attachment 3 - Attendance List
- Attachment 4 - Meeting Handouts

MILESTONE M-32-00  
PROJECT MANAGERS MEETING  
November 1, 1996

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Agenda

1. INTRODUCTIONS
2. 244-AR VAULT
3. 242-A EVAPORATOR
4. CHANGE CONTROL FORM M-32-96-02

MILESTONE M-32-00  
PROJECT MANAGERS MEETING  
November 1, 1996

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Summary of Discussion, Agreements and Actions

The purpose of this meeting was primarily to discuss double-shell tank (DST) integrity assessments. As part of this discussion, methods used to address 244-AR Vault and 242-A Evaporator issues were statused.

242-A EVAPORATOR - Though not reflected in the PMM agenda's order of topics, the 242-A Evaporator was discussed first. Ms. Ana Sherwood, of Rust Federal Services of Hanford Inc. (RFSH), provided a brief explanation why the 242-A Evaporator was not included in the scope of draft change control form M-32-96-02. Originally, the 242-A Evaporator had been included in the work scope outlined by the "Tank Waste Remediation System Tank System Integrity Assessments Program Plan (WHC-SD-WM-AP-017, Rev. 1). This resulted in the Evaporator's inclusion in later proposed DST integrity assessment milestone activities. After reevaluating this approach, it was determined that the Evaporator did not need to be included in draft M-32-96-02 as its dangerous waste tank system integrity assessment had already been performed. As part of existing interim milestone M-32-05, an integrity assessment was performed on the 242-A Evaporator in March 1994. At the time of the assessment, Mr. Gary Anderson, of the Washington State Department of Ecology (Ecology), who was familiar with the assessment's results, provided a determination that based on the essential nature of the Evaporator, it could be operated in its current configuration. The integrity assessment report identified a future assessment date of five years after submittal of the report. As the 242-A Evaporator is currently on schedule to perform its next assessment, it no longer needs a vehicle like the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) to address assessment compliance schedules.

Ms. Laura Cusack and Mr. Bob Wilson, both of Ecology, were given a copy of the current M-32-00 major milestone and a copy of Mr. Anderson's letter (see Attachment 4, items #1 and #4, respectively) and will review the removal of the 242-A Evaporator from draft change control form M-32-96-02.

244-AR VAULT - Ms. Sherwood handed out a schematic of the 244-AR Vault (see Attachment 4, item # 3) and reviewed current plans to transfer the 244-AR Vault from the DST Part A Permit application (DST Part A, DOE/RL-88-21) to the single-shell tank (SST) Part A Permit application (SST Part A, DOE/RL-88-21). The reasons for this transfer are that the vault is inactive (no waste transfers received since 1978 [estimated]) and there are no plans for any future missions. When Milestone M-32-00 was created, it specifically excluded the SST units from its scope. The SST units were to be addressed by a different milestone(s). With the transfer of the 244-AR Vault to the SST Part A Permit application, the vault is properly addressed by SST milestones. A second draft change control form, M-32-96-03, was provided to Ecology for their consideration (see Attachment 4, item # 2). This draft change control form moves the 244-AR Vault activities from Tri-Party Agreement milestone M-32-00 to milestone M-45-00.

CHANGE CONTROL FORM M-32-96-02 - A copy of draft change control form M-32-96-02 was given to Ecology (see Attachment 4, item # 5) for their review. Mr. Dale Jackson, of the U.S. Department of Energy, Richland Operations Office (RL), explained that this draft change control form completed the DST integrity assessments by 1998, but did not complete corrective actions by 1999 as proposed by Ecology. Therefore, there may be a need for more milestones that go beyond the 1999 date.

Ms. Cusack mentioned the need for a discussion on the DST ultrasonic evaluations. She was shown where draft interim milestone M-32-09 has such a discussion. Ecology will review this section and propose further wording, if desired. Mr. Wilson asked how the quality of the test itself would be evaluated. Mr. Jackson answered that Mr. Keith Scott, of SGN Eurisys Services Corporation (SESC), would evaluate the test method and if a problem did arise the change request process would be available for any changes required. Mr. Mark Ramsay (RL) pointed out that a previous commitment to have the Tank Integrity Structural Panel (TSIP) provide a peer review and recommendation on the first tank examination was still in effect. When asked, Ms. Cusack agreed to provide the independent qualified registered professional engineer (IQRPE) certifying the DST integrity assessment report with a letter acknowledging Ecology's acceptance of assessing six DSTs for all 28 DSTs from a regulatory standpoint if the IQRPE agreed with the validity of the "6 for 28" assessment on an engineering basis.

At this point of the meeting, Mr. Scott provided a short briefing on the status of the DST integrity assessments (see Attachment 4, item #6). As he outlined the near-term actions, Mr. Scott emphasized that the dates given were contingent on each other. He explained that the mock-up test, scheduled for the week of November 11th, would not be performed on a "cleaned" surface. The surface would not, however, be as "dirty" as a tank surface. The next test, scheduled for the week of November 18th, would be an abridged version of an actual tank examination, i.e., the abridged test would scan a 5-inch strip on the primary and secondary walls of tank AW-103. Ms. Cusack asked to be present during discussions (asked that notification be provided to Ecology, but Ecology will not hinder progress if they were not available) that evaluate data received from these tests. Mr. Scott agreed and also invited Ecology to attend on the day of the tests. Ms. Cusack asked if there would still be an expert panel (this panel is different than the TSIP) involved.

Mr. Scott answered that there would be for the actual test of tank AW-103, schedule for the week of November 25th, should acceptance criteria be exceeded. The expert panel would not be involved during the tests scheduled for the weeks of November 11th and 18th as these tests were just pilot runs. He also reminded everyone that the TSIP would be involved in evaluating the tank AW-103 test results (from the week of November 25th). Next, Ms. Cusack wondered if the weather or holidays could impact the test schedule. Mr. Scott explained that as a water coupling would be used, freezing conditions could impact the schedule. As to the holidays, there is a 30 day period between tests to allow for "regrouping" once the first test was completed. This should allow for delays due to the holidays. Ms. Cusack recommended that the TSIP be alerted to this schedule so that they could be as available as possible.

At this point, Mr. Ramsay established the protocol for Lockheed Martin Hanford (LMH) to discuss DST test/result problems, should they occur, with Ecology. He suggested that LMH could directly and informally (no transmittal letter) go to Ecology without first going through Fluor Daniel Hanford, Inc. (FDH) for concurrence. Mr. Fred Ruck (FDH) said that he did not see a problem with this as long as LMH first went through RL. He agreed that FDH could receive information at the same time as Ecology and that a cc:message would be an acceptable form to use.

Then, Mr. Wilson questioned why the ultrasonic examination was being performed only in the region beneath the riser. Mr. Scott explained that caution had to be exercised with the test equipment. His concern dealt with the test equipment's ability to stay on the tank wall. If the equipment slips, it could be damaged. One precaution against this is the cable length being used. The cable length is shorter, by design, than the tank height. This is done so that should the equipment slip, it would not hit the annulus floor. However, this does not prevent the equipment from swinging back and forward. Ms. Cusack asked what was the cost per test. Mr. Scott provided, from memory, the cost of the vendor (there are additional costs involved) to perform a wall ultrasonic evaluation (provide data and interpretation): ~\$100K for the mock-up test (week of November 11th); ~\$30K - \$40K for the "abridged" test (week of November 18th); ~\$20K - \$30K for the actual AW-103 test (week of November 25th).

Mr. Wilson also asked if all the tank bottom air slots were accessible. Mr. Scott responded that not all the slots were designed for access. Those that would be part of the assessment activities would be entered up to about 1-foot. The tank bottom evaluation is restricted by commercially available equipment. At best, the maximum length possible would be a few feet. Ms. Cusack asked if two risers would be possible, if it was determined that the tank walls would not require cleaning. Mr. Jackson replied that once the first test was completed, the use of two risers could be investigated. Again, should this be the case, the change request process could then be used to modify the assessment activities. Ms. Cusack expressed her concern that increasing assessment scope would be difficult once draft interim milestone M-32-09 was approved. She said that Ecology would propose language to the draft interim milestone stating that Ecology was not totally comfortable with the percentage of tank surface being examined. Mr. Jackson agreed to review their proposed wording. After discussing the TSIP guidelines on percentages and

the various features of the DST integrity assessment strategy that either increase or decrease uncertainties, Mr. Wilson stated that examining a 20-inch by 35-foot strip was part of the process that was in itself being evaluated and that this evaluation was in line with Ecology's intent. Mr. Jackson pointed out that if the draft interim milestones of change control form M-32-96-02 were to require more than \$1.7 million, then he would have to involve DOE-HQ and get their approval.

Ms. Cusack asked if some of the draft interim milestone M-32-10 assessments activities could be completed by 1998. Mr. Scott answered that if some of those activities were to be performed earlier than scheduled that it would impact the completion of some of the DST integrity assessments from draft interim milestone M-32-09. Ms. Cusack and Mr. Jackson agreed that Ecology could propose language to the preamble of the draft change control form to acknowledge the possibility of accelerating the draft M-32-10 assessment activities.

Ms. Cusack requested a copy of the planning package for the \$1.7 million budget. Mr. Ramsay agreed that Mr. Scott could provide Ecology with a copy but stated that the package was for information only and not subject to comment.

Ms. Cusack mentioned her wishes to have a method of measuring process. Mr. Ramsay offered to forward her a copy of the monthly status report he receives from Mr. Scott.

Mr. Jackson took the action to schedule the next PMM (tentatively scheduled for November 14th).

Mr. Jackson closed the meeting with the assertion that the draft change control form M-32-96-02 contained the best package obtainable and that no negotiation slack had been built-in.

Agreements/Actions:

1. Ms. Cusack/Mr. Wilson will review the removal of the 242-A Evaporator from draft change control form M-32-96-02.
2. Ms. Cusack/Mr. Wilson will review the draft change control form M-32-96-03 (244-AR Vault).
3. Ms. Cusack/Mr. Wilson will review the draft change control form M-32-96-02 (DST integrity assessments).
4. Ms. Cusack will provide a letter for the IQRPE acknowledging Ecology's acceptance of assessing six DSTs for all 28 DSTs from a regulatory standpoint provided the IQRPE agrees with the validity of this assessment from an engineering basis.

5. Mr. Scott will notify Ms. Cusack/Mr. Wilson of test days and invite Ecology to test data evaluation discussions (for tests scheduled for weeks of November 11th, 18th, and 25th). *(Mr. Scott notified Ms. Cusack/Mr. Wilson of the November 19, 1996 mock-up test and of the November 23, 1996 through November 25, 1996 AW-103 abridged and actual tests. Mr. Wilson attended the November 23, 1996 test.)*
6. Mr. Scott will inform the TSIP (or select members) of the AW-103 assessment schedule. *(Mr. Scott has informed Mr. Kamal Bandyopadhyay of the TSIP of this schedule.)*
7. Lockheed Martin Hanford will be able to directly and informally (no transmittal letter) discuss DST test/result problems with Ecology, after first informing RL. Fluor Daniel Hanford will receive this type of information at the same time as Ecology.
8. Mr. Scott will provide Ms. Cusack with a copy of his DST integrity assessment budget planning package. *(Mr. Scott sent Ms. Cusack his budget planning package via cc:mail on November 4, 1996.)*
9. Mr. Ramsay will forward copies of Mr. Scott's monthly status report to Ms. Cusack.
10. Mr. Jackson will finalize meeting details for the next PMM.

MILESTONE M-32-00  
PROJECT MANAGERS MEETING  
November 1, 1996

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Attendees

| NAME                | ORGANIZATION   |
|---------------------|--|
| Russ Brown          | Fluor Daniel Hanford, Inc.<br>- TPA Integration          |
| Laura Cusack        | Ecology  |
| Geneva Ellis-Balone | DOE-EAP  |
| Brad Erlandson      | Lockheed Martin Hanford<br>Corporation                   |
| Dale Jackson        | DOE-EAP  |
| Mark Ramsay         | DOE-RL   |
| Fred Ruck           | Fluor Daniel Hanford, Inc.<br>- Environmental Protection |
| Keith Scott         | SGN Eurisys Services<br>Corporation                      |
| Ana Sherwood        | Rust Federal Services of<br>Hanford Inc.                 |
| Jack Thurman        | Lockheed Martin Hanford<br>Corporation                   |
| Bob Wilson          | Ecology  |

**M-32-00 PROJECT MANAGERS MEETING**

**November 1, 1996**

[illegible]

**MILESTONE M-32-00  
PROJECT MANAGERS MEETING  
November 1, 1996**

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**Meeting Handouts  
(attached)**

1. Current Major Milestone M-32-00.
2. Draft Change Control Form M-32-96-03 (244-AR Vault).
3. Schematic of the 244-AR Vault.
4. Letter, Mr. Gary Anderson, Ecology, to Mr. James Bauer, RL, "242-A Evaporator Restart," dated November 16, 1993.
5. Draft Change Control Form M-32-96-02 (DST assessments; pagination has been corrected).
6. "Double-Shell Tank System Integrity Assessment Status" handout.

Table D. Major and Interim Milestones

| <u>Number</u>           | <u>Milestone</u>   | <u>Due Date</u>                              |
|-------------------------|--|--|
| M-26-05F                | SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.   | 8/31/2003<br>and<br>biennially<br>thereafter |
| M-26-05G                | SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.   | 8/31/2005<br>and<br>biennially<br>thereafter |
| M-26-05H                | SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.   | 8/31/2007<br>and<br>biennially<br>thereafter |
| M-32-00                 | COMPLETE IDENTIFIED DANGEROUS WASTE TANK CORRECTIVE ACTIONS.   | 9/30/1999                                    |
| LEAD AGENCY:<br>ECOLOGY | <p>COMPLETION OF INTERIM MILESTONE TASKS MAY IDENTIFY THE NEED FOR ADDITIONAL ACTIONS OR INTERIM MILESTONES IN THE FUTURE. THE REPORTS AND DEFICIENCY CORRECTION SCHEDULES PREPARED TO SATISFY CURRENT MILESTONES WILL BE USED TO IDENTIFY ANY APPROPRIATE NEW INTERIM MILESTONES. ANY NEW INTERIM MILESTONES WILL SUBSEQUENTLY BE ESTABLISHED VIA THE CHANGE PROCESS IN SECTION 12 OF THE ACTION PLAN.</p> <p>TANK INTEGRITY ASSESSMENTS WILL NOT BE REQUIRED FOR TERMINAL CLEANOUT OF THE PLUTONIUM-URANIUM EXTRACTION PLANT, EXCEPT FOR TANKS F18, U3, AND U4. INTEGRITY ASSESSMENTS FOR TANKS F18, U3, AND U4 HAVE BEEN COMPLETED.</p> |  |
| M-32-02                 | COMPLETE 219-S TANK INTERIM STATUS ACTIONS.  | 9/30/1997                                    |
| M-32-02-T02             | UPGRADE EXISTING TRANSFER LINES TO MEET SECONDARY CONTAINMENT REQUIREMENTS.  | 9/30/1997                                    |
| M-32-03                 | COMPLETE T PLANT TANK ACTIONS.   | 9/30/1999                                    |
| M-32-03-T06             | COMPLETE SCHEDULED UPGRADES TO T PLANT TANK SYSTEM (PROJECT W-259).  | 9/30/1999                                    |
| M-32-06                 | COMPLETE 244-AR VAULT INTERIM STATUS TANK ACTIONS.   | TBD  |

Table D. Major and Interim Milestones

| <u>Number</u>           | <u>Milestone</u>  | <u>Due Date</u> |
|-------------------------|---|-----------------|
| M-32-06-T01             | COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT AND IDENTIFIED UPGRADES FOR 244-AR VAULT INTERIM STATUS TANK SYSTEM (EXCEPT THAT DST TRANSFER LINES THAT PENETRATE THE 244-AR VAULT WILL CONTINUE TO BE USED). PROVIDE A SCHEDULE TO ADDRESS ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE.  | TBD             |
| M-32-07                 | COMPLETE B PLANT INTERIM STATUS TANK ACTIONS.   | 6/30/1996       |
| M-32-07-T05             | PERFORM OPERATIONS TO SEPARATE RADIONUCLIDES FROM THE ORGANIC SOLVENT WASTE TO SUPPORT DISPOSITION OF THE WASTE TO AN OFFSITE DISPOSAL FACILITY, OR COMPLIANT INTERIM STORAGE.  | 6/30/1996       |
| M-32-08                 | COMPLETE GROUT INTERIM STATUS TANK ACTIONS.   | TBD             |
| M-32-08-T01             | COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT FOR GROUT INTERIM STATUS TANK SYSTEM. COMPLETE ACTIVITIES REQUIRED TO CORRECT ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE.   | TBD             |
| M-34-00                 | COMPLETE ACTIONS SPECIFIED BY AGREED INTERIM MILESTONES RELATED TO REMEDIATION OF THE K-EAST BASINS.  | TBD             |
| LEAD AGENCY:<br>ECOLOGY |   |                 |
| M-34-00-T02             | INITIATE K-EAST BASIN FUEL ENCAPSULATION.   | TBD             |
| M-34-00-T06             | INITIATE K-EAST BASIN SLUDGE ENCAPSULATION.   | 11/30/1996      |
| M-34-00-T07             | COMPLETE ENCAPSULATION OF THE FUEL AND SLUDGE WITHIN K-EAST BASIN.  | 12/31/1998      |
| M-34-00-T08             | REMOVE ALL FUEL AND SLUDGE FROM BOTH K-EAST AND K-WEST BASINS IN AN ENCAPSULATED FORM.  | 12/31/2002      |
| M-34-01                 | CONTAMINATED K-EAST BASIN WATER WILL BE REMOVED, REPLACED, OR TREATED. THE TIMING OF THIS ACTION MUST BE COORDINATED WITH ENCAPSULATION AND THE CLEANING OF THE RESIDUAL CONTAMINATION IN THE BASIN AND (AS NOTED BELOW) THE ALTERNATIVE SELECTION IS DEPENDANT ON THE FEASIBILITY OF MOVING ENCAPSULATED K-EAST BASIN FUEL AND SLUDGE TO THE K-WEST BASIN. THE CONTAMINATED WATER WILL BE DISPOSITIONED IN ACCORDANCE WITH REASONABLE AVAILABLE HANFORD SITE TREATMENT AND/OR DISPOSAL PROCESSES AND METHODS, AVAILABLE AT THE TIME OF THIS ACTION. UNLESS A BETTER OPTION BECOMES AVAILABLE, THE WATER WILL BE TRUCKED TO C-018 FOR DISPOSAL. | TBD             |
|                         | IF THE K-EAST FUEL AND SLUDGE, ONCE ENCAPSULATED, CAN BE MOVED TO THE K-WEST BASIN (DETERMINED THROUGH A SEPTEMBER 1994 ENGINEERING STUDY TARGET DATE) THE  |                 |

## DRAFT

|   |   |                                |                             |
|---|---|--------------------------------|-----------------------------|
| Change Number<br><b>M-32-96-03</b>  | Federal Facility Agreement and Consent Order<br>Change Control Form<br><small>Do not use blue ink. Type or print using black ink.</small> |                                | Date<br><b>Nov. 1, 1996</b> |
| Originator<br><b>D. E. Jackson</b>  |   | Phone<br><b>(509) 376-4851</b> |                             |
| Class of Change<br><input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager   |   |                                |                             |
| Change Title<br><b>Delete TPA interim milestone M-32-06.</b>  |   |                                |                             |
| Description/Justification of Change<br><p>The 244-AR Vault consists of a two-level, multi-cell, reinforced concrete structure that houses two 43,000 gallon tanks (TK-001 and TK-002) and two 4785 gallon tanks (TK-003 and TK-004). The four tanks operate under interim status and are presently addressed under the dangerous waste Double-Shell Tank Part A Permit, Form 3. No waste transfers to the 244-AR Vault have been made since 1978 (estimated). Current status is to continue monitoring the existing waste levels in the tanks and sumps, remove sump liquids as soon as operationally feasible, and begin deactivation planning. As there are no future missions planned for this vault, efforts are underway to transfer the 244-AR Vault to the dangerous waste Single-Shell Tank (SST) Part A Permit, Form 3.</p> <p>(continued on the following page)</p> |   |                                |                             |
| Impact of Change<br><p>This change will align the 244-AR Vault with its correct TPA milestone. Closure of the 244-AR Vault can then be achieved without requiring upgrades on a unit that has no future use.</p>  |   |                                |                             |
| Affected Documents<br><p>Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Table D.</p>   |   |                                |                             |
| Approvals   |   |                                |                             |
| DOE   | Date  | ___ Approved                   | ___ Disapproved             |
| EPA   | Date  | ___ Approved                   | ___ Disapproved             |
| Ecology   | Date  | ___ Approved                   | ___ Disapproved             |

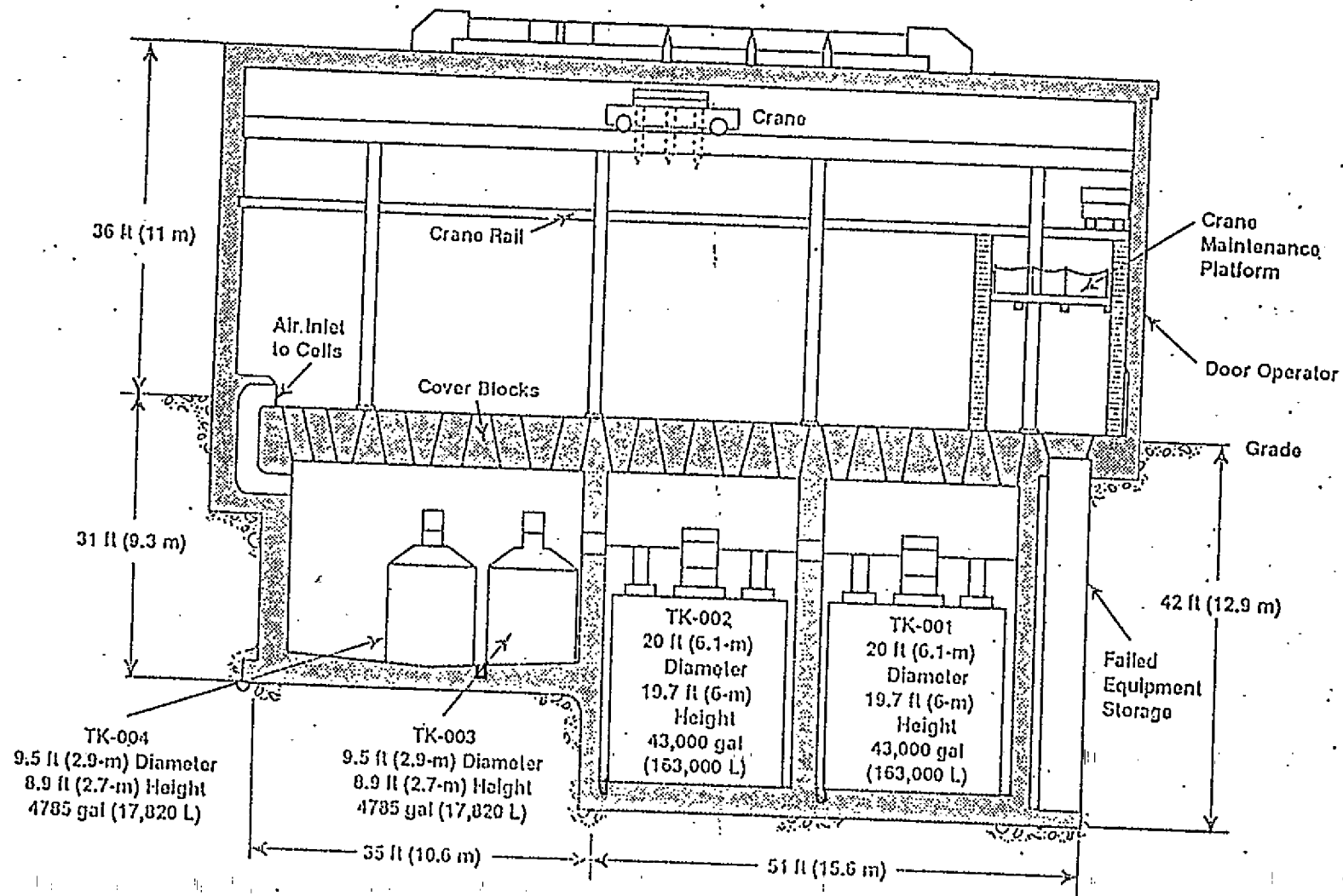
(Description/Justification of Change continued)

During initial negotiations on TPA Milestone M-32-00, it was determined that SST units would require separate negotiations/milestones. Therefore, the scope of TPA Milestone M-32-00 excluded SST units. Once under the SST Part A Permit, the 244-AR Vault will be addressed by TPA Milestone M-45-00. TPA Milestone M-45-00 addresses complete closure of all SST farms without mandating upgrades to achieve compliance with RCRA interim status tank system requirements. No wording changes, due to this transfer, need be made to Milestone M-45-00.

Modify TPA interim milestone M-32-06 as follows:

M-32-06      Delete.

# 244-AR Vault



39208044.23



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

November 16, 1993

Mr. James D. Bauer  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352-0550

Dear Mr. Bauer:

Re: 242-A Evaporator Restart

This letter is in response to five issues raised at the presentation made on October 28, 1993. Your staff requested that we concur on these issues so that the evaporator restart could begin on schedule. Our response is as follows:

If the tank farm interim status training plan is submitted by December 31, 1993, no objection will be made to the restart. Preparation of these plans should be closely coordinated with Ecology to ensure that no unexpected problems arise upon submission. The contents of this submission are being added to the conditions in the Notice of Deficiency list in the Part B Permit Application.

If the 242-A and LERF Resource Conservation and Recovery Act Inspection schedules are submitted by December 1, 1993, no objection will be made to the restart of the Evaporator.

The close coordination of the writing of these schedules and the forms required should continue. The contents of this submission are being added to the conditions in the Notice of Deficiency list for the Part B Permit Application.

If the comprehensive revision of the 242-A Evaporator sampling and analysis plan in order to meet the data quality objective program and the ALARA revisions to the HPA SW-846 procedures continues in good faith, no objection will be raised to the scheduled restart. The contents of this submission are being added to the conditions in the Notice of Deficiency list in the Part B Permit Review. This condition will be made a part of the Notice of Deficiency list for the 242-A Evaporator.

If the revision of the storage code in the Part A Application, coupled with the same revision for the applicable sections in the Part B Application, no objection will be raised to the restart of the 242-A Evaporator.

Mr. James D. Bauer  
November 16, 1993  
Page 2

No physical revision of the pipe wall penetrations or the floor drains in the evaporator pump room will be required prior to the evaporator restart. If at any time leakage is seen or detected from either of these installations, or if for any reason these installations are repaired or rebuilt, they will be rebuilt or repaired in accordance with regulations. Should a spill occur in the evaporator pump room, the sump and the piping shall be rinsed three times as required in WAC 173-303-160 as appropriate. "Appropriate in this case means that the original regulation was written for a free container, not a sump, so that judgement will have to be used in the application of the regulation. The rinsate shall be transferred to the double shell tanks.

If you have any questions about this letter, please call me at (206) 407-7139.

Sincerely,

  
Gary Anderson, P.E.  
Nuclear and Mixed Waste Management Program

GA:jr

cc: Paul Carter, DOE  
Dan Duncan, EPA  
Ronald Gerton, DOE  
Sue Price, WHC  
Gene Senat, DOE  
Doug Sherwood, EPA

# DRAFT

|  |   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
|--|---|-------------------------|-----------------|--------------|-------------------------------|----------------------------------|------|--------------|-----------------|---------|------|--------------|-----------------|--|
| Change Number<br><br><b>M-32-96-02</b>   | <b>Federal Facility Agreement and Consent Order<br/>Change Control Form</b><br><small>Do not use blue ink. Type or print using black ink.</small> | Date<br><b>10-17-96</b> |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Originator</td> <td style="width: 50%; border: none;">Phone</td> </tr> <tr> <td style="border: none;"><b>M. Ramsay / D. Jackson</b></td> <td style="border: none;"><b>(509) 376-7924 / 376-4851</b></td> </tr> </table>  |   |                         | Originator      | Phone        | <b>M. Ramsay / D. Jackson</b> | <b>(509) 376-7924 / 376-4851</b> |      |              |                 |         |      |              |                 |  |
| Originator   | Phone   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| <b>M. Ramsay / D. Jackson</b>  | <b>(509) 376-7924 / 376-4851</b>  |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Class of Change<br><div style="display: flex; justify-content: space-around;"> <span><input type="checkbox"/> I - Signatories</span> <span><input checked="" type="checkbox"/> II - Executive Manager</span> <span><input type="checkbox"/> III - Project Manager</span> </div>  |   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Change Title<br><b>Addition of M-32 Milestones for the Double-Shell Tank System.</b>   |   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Description/Justification of Change<br><br><p>Major Milestone M-32-00 states that "completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future." The Tank Waste Remediation Systems Transfer Facility Compliance Plan (WHC-SD-WM-EV-094, Rev. 0) submitted in fulfillment of M-32-04-T04 identified portions of the Double-Shell Tank (DST) Transfer System that are not in full compliance with interim status dangerous waste management regulations, and require corrective actions and/or compliance strategies. This report is to be updated in December 1996 (Rev. 1). The Tank Waste Remediation System Tank System Integrity Assessments Program Plan (WHC-SD-WM-AP-017, Rev. 1) submitted in fulfillment of M-32-04-T05 identified a path forward to complete integrity assessments of the DST system including double-contained receiver tanks (DCRTs), the 241-A-350 Drainage Lift Station, the 204-AR Waste Unloading Facility, and various transfer lines, diversion boxes, valve pits, pump pits, seal pots, and cleanout boxes.</p> <p>(Continued on the following page)</p> |   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Impact of Change   |   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Affected Documents<br><br><b>Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Table D.</b>  |   |                         |                 |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Approvals<br><br><table style="width: 100%; border: none;"> <tr> <td style="width: 25%; border-bottom: 1px solid black;">DOE</td> <td style="width: 10%; border-bottom: 1px solid black;">Date</td> <td style="width: 10%;">___ Approved</td> <td style="width: 10%;">___ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Ecology</td> <td style="border-bottom: 1px solid black;">Date</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> </table>  |   | DOE                     | Date            | ___ Approved | ___ Disapproved               | EPA                              | Date | ___ Approved | ___ Disapproved | Ecology | Date | ___ Approved | ___ Disapproved |  |
| DOE  | Date  | ___ Approved            | ___ Disapproved |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| EPA  | Date  | ___ Approved            | ___ Disapproved |              |                               |                                  |      |              |                 |         |      |              |                 |  |
| Ecology  | Date  | ___ Approved            | ___ Disapproved |              |                               |                                  |      |              |                 |         |      |              |                 |  |

## DRAFT

Change Number M-32-96-02, Rev. 0

Page 2 of 4

### Description/Justification of Change (cont'd)

The DST System Part B Permit is scheduled for issuance in September 1999 by modification of the Hanford Facility RCRA Permit, Dangerous Waste Portion. The interim milestones of this change package support the issuance of that Part B Permit by providing a compliance strategy for the completion of the DST system integrity assessments.

Once complete, the integrity assessment reports will include a schedule for addressing deficiencies found during the assessments. The transfer facility compliance plan will address other deficiencies that are not related to structural integrity, such as leak detection. Based on the nature of the deficiency, addressing that deficiency could include a corrective action, compliance strategy, or future negotiations. Minor deficiencies will have identified resolution (corrective action or compliance strategy) completion dates in the report's deficiency schedule. In the event that a deficiency requires major efforts to remedy the situation, the U.S. Department of Energy, Richland Operations Office and the Washington State Department of Ecology will enter into negotiations on methods to address the issue. In such cases, the report's schedule will propose an initial negotiation meeting date.

This change package adds two new interim milestones, M-32-09 and M-32-10. Interim milestone M-32-09 addresses the DST integrity assessments, while M-32-10 addresses transfer lines (includes diversion boxes, valve pits, pump pits and cleanout boxes), catch tanks, DCRTs, and ancillary equipment (i.e., 241-A-350 Drainage Lift Station, 204-AR Waste Unloading Facility, and seal pots).

As part of the DST ultrasonic testing, results will be evaluated by a technical panel of experts (i.e., select members from the Tank Structural Integrity Panel). This panel's evaluation will be considered, along with other information, in determining the need for future ultrasonic testing beyond six DSTs.

Other DST dangerous waste tank system compliance issues, such as leak detection, may require the addition of a future interim milestone.

## DRAFT

Change Number M-32-96-02, Rev. 0

Page 3 of 4

Add the following interim milestones:

|                |   |                       |
|----------------|---|-----------------------|
| <b>M-32-09</b> | <b>Complete integrity assessments for Double-Shell Tanks (DSTs).</b>  | <b>September 1998</b> |
|                | <p>These integrity assessments will consist of a combination of visual inspections and design reviews on all 28 DSTs, and ultrasonic testing on six DSTs (including their secondary containment). This milestone reflects an agreement between the Washington State Department of Ecology and the U.S. Department of Energy, Richland Operations Office that six DSTs will undergo ultrasonic testing for the integrity assessment of the 28 DSTs. The results of these tests will be evaluated to determine the need, if any, for future ultrasonic testing of part or all remaining DSTs.</p> <p>Tank wall ultrasonic testing: The extent of the examination shall be a 20 inch wide by 35 foot long vertical strip of the primary and secondary tanks to detect wall thinning and pits. Crack detection in the primary tank shall include the area adjacent to horizontal welds and will detect longitudinal cracks.</p> <p>Tank bottom ultrasonic testing: The extent of the examination shall be the area accessible in 8 air slots under the primary tanks at the high stress area between the knuckle and tank bottom. Cracks oriented perpendicular to the air slot, acted on by the highest tank stresses will be detected. Also, wall thinning and pits will be detected.</p> |                       |
| M-32-09-T01    | Perform ultrasonic testing of two tank walls and one tank bottom.   | September 1997        |
| M-32-09-T02    | Perform ultrasonic testing of four tank walls and five tank bottoms.  | September 1998        |
| M-32-09-T03    | Complete and submit integrity assessments reports for six DSTs. Provide a schedule to address any deficiencies described in the report related to tank compliance.  | September 1998        |

**DRAFT**

Change Number M-32-96-02, Rev. 0

Page 4 of 4

|                |   |                       |
|----------------|---|-----------------------|
| <b>M-32-10</b> | <b>Complete integrity assessments for specified Double-Shell Tank (DST) system.</b>   | <b>September 1999</b> |
| M-32-10-T01    | Complete and submit integrity assessment reports for DST transfer lines (includes diversion boxes, valve pits, pump pits and cleanout boxes). This assessment will be based on a representative evaluation. Provide a schedule to address any deficiencies described in the report related to tank transfer line compliance.  | December 1996         |
| M-32-10-T02    | Complete and submit integrity assessment reports for nine catch tanks. These catch tanks are 241-A-302A, 241-ER-311, 241-EW-151, 241-TX-302C, 241-U-301B, 241-UX-302A, 241-AZ-151, 241-AX-152, and S304. Provide a schedule to address any deficiencies described in the report related to catch tank compliance.   | September 1999        |
| M-32-10-T03    | Complete and submit integrity assessment reports for five double-contained receiver tanks (DCRTs). These DCRTs are 244-TX, 244-BX, 244-U, 244-S, and 244-A. Provide a schedule to address any deficiencies described in the report related to DCRT compliance.  | September 1999        |
| M-32-10-T04    | Complete and submit integrity assessment reports for DST ancillary equipment. This ancillary equipment is comprised of the 241-A-350 Drainage Lift Station, the 204-AR Waste Unloading Facility, and 16 seal pots (for which a representative evaluation will be performed). Provide a schedule to address any deficiencies described in the report related to tank ancillary equipment compliance. | September 1999        |

Double-Shell Tank System Integrity Assessment Status  
November 1, 1996

Events from May Through Present

- May - WHC Decision Board revises the tank inspection strategy
- June 25 - Meeting with Tank Structural Integrity Panel
  - It is important to know the condition of the tanks
  - First, collect ultrasonic data on a tank
- August - RL directed WHC to execute the inspection strategy
- September 27 - Contract awarded to SAIC to perform ultrasonic examination of the tank wall

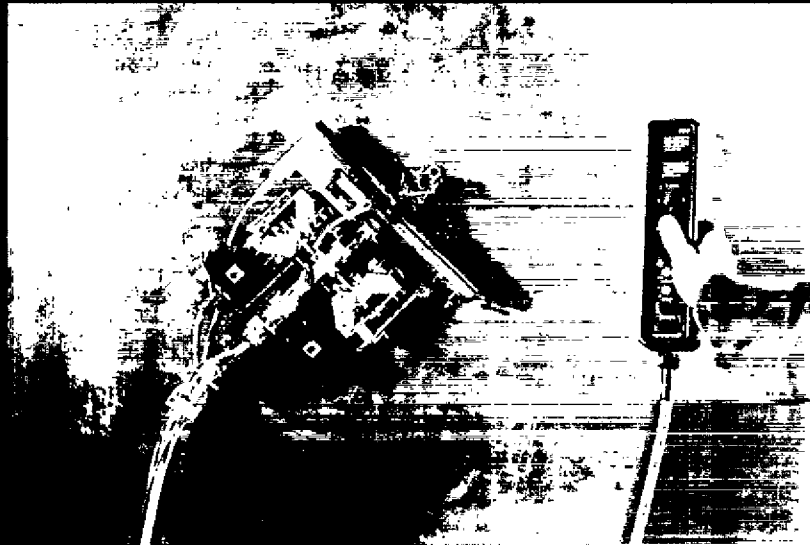
Near Term Actions (approximate dates)

- Week of November 11 - Performance test in tank mockup
- Week of November 18 - Tank AW103 trial examination (conditional on acceptable performance test)
- Week of November 25 - Tank AW103 wall examination (conditional on acceptable trial examination)

# **AWS-5**

**Automatic  
Weld  
Scanner**

**Remote-Controlled Magnetic Wheel  
Ultrasonic Scanner**



**FORCE  
INSTITUTES**

96100409-1DF

Meeting Minutes  
Interim Status Dangerous Waste Tank Systems  
Hanford Federal Facility Agreement and Consent Order  
Milestone M-32-00

PROJECT MANAGERS MEETING  
November 1, 1996

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Administrative Record: TPA Milestone M32-00:  
T-2-5, TS-2-1, T-2-7, TS-2-3, S-2-3  
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